

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT ON LIABILITY

Alek Schott v. Bexar County, Texas

Case No. 5:23-cv-00706-OLG-RBF

EXHIBIT 39

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

ALEK SCHOTT

Plaintiff,

v.

Civil Action No. 5:23-cv-00706-OLG-RBF

BEXAR COUNTY, TEXAS,

Defendants.

DECLARATION OF RICARDO J. PALACIOS
IN SUPPORT OF PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

I, Ricardo J. Palacios, declare the following:

1. I am a United States citizen, a Texas resident, over 18 years old, and competent to make this declaration, which I make voluntarily based on my personal knowledge.
2. I am the owner and manager of Palacios Accident Reconstruction, LLC. I started my company in 2007 and have been analyzing accidents, vehicle movements, and lines of sight, among other things, in my private capacity for at least 17 years and counting.
3. On October 15, 2023, the Institute for Justice, on behalf of Plaintiff Alek Schott, hired me to consult on questions and matters related to vehicle movement, lines of sight, whether it was reasonable to believe that Mr. Schott drifted over the fog line, traffic violations, and traffic stops generally.
4. On January 10, 2024, I inspected Mr. Schott's 2019 Ford F250 and visited the site where Mr. Schott passed Deputy Babb of the Bexar County Sheriff's Office on March 16, 2022.
5. Exhibit 39a to Plaintiff's Motion for Summary Judgment is a true and correct copy of the report I produced in this case based on my training, experience, expertise, inspection of Mr.

Schott's vehicle and the site where Mr. Schott passed Deputy Babb on March 16, 2022, and footage from Mr. Schott's personal dashcam.

6. I hereby incorporate Exhibit 39a to Plaintiff's Motion for Summary Judgment as my testimony in this matter as if fully set forth in this declaration.

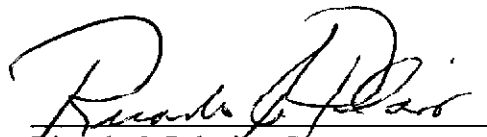
7. Exhibit 39b to Plaintiff's Motion for Summary Judgment contains true and correct copies of materials upon which I relied in producing my report.

8. I hereby incorporate Exhibit 39b to Plaintiff's Motion for Summary Judgment as if those materials were fully set forth in this declaration.

The remainder of this page has intentionally been left blank.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 5th day of June, 2025

A handwritten signature in black ink, appearing to read "Ricardo J. Palacios, Sr.", written over a horizontal line.

Ricardo J. Palacios, Sr.

License Number A14971

Palacios Accident Reconstruction, LLC